



United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 <input checked="" type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input checked="" type="checkbox"/> 4 <input checked="" type="checkbox"/> 5 <input checked="" type="checkbox"/> 6 <input checked="" type="checkbox"/> 7 <input checked="" type="checkbox"/> 8 <input checked="" type="checkbox"/> 9 <input checked="" type="checkbox"/> 10 <input checked="" type="checkbox"/> 11 <input checked="" type="checkbox"/> 12 <input checked="" type="checkbox"/> 13 <input checked="" type="checkbox"/> 14 <input checked="" type="checkbox"/> 15 <input checked="" type="checkbox"/> 16 <input checked="" type="checkbox"/> 17 <input checked="" type="checkbox"/> 18 <input checked="" type="checkbox"/> 19 <input checked="" type="checkbox"/> 20 <input checked="" type="checkbox"/>	11	12	13	14	15
Remarks					
21					
66					
Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved	
67 <input checked="" type="checkbox"/> 68 <input checked="" type="checkbox"/> 69 <input checked="" type="checkbox"/> 70 <input checked="" type="checkbox"/> 71 <input checked="" type="checkbox"/> 72 <input checked="" type="checkbox"/> 73 <input checked="" type="checkbox"/> 74 <input checked="" type="checkbox"/> 75 <input checked="" type="checkbox"/> 76 <input checked="" type="checkbox"/> 77 <input checked="" type="checkbox"/> 78 <input checked="" type="checkbox"/> 79 <input checked="" type="checkbox"/> 80 <input checked="" type="checkbox"/>					

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time/Date	Permit Effective Date
PINNACLE FOODS GROUP, LLC 29984 PINNACLE WAY MILLSBORO, DE 19966	0945 hrs 8-4-11	11-01-08
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Exit Time/Date	Permit Expiration Date
ROBERT LYNCH - DEC LEVER IV DENNIS PARKINSON - DEC LEVER IV 302-934-3833	1520 hrs 8-4-11	10-31-13
Name, Address of Responsible Official/Title/Phone and Fax Number	Other Facility Data (e.g., SIC NAICS, and other descriptive information)	
RANDY SPENCE PLANT MANAGER 302-934-3841		
Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
GLENN DAVIS	DNREC 302-739-9946	8-4-11
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
Robert Underwood	DNREC 302-739-9946	8-26-11

Sections F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable

PERMIT NO.

DE 000736

SECTION F - Facility and Permit Background

ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY
(Including City, County and ZIP code)

DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE

FINDINGS

6-23-10
SEE REPORT

SECTION G - Records and Reports

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.
DETAILS:☒ YES ☐ NO ☐ N/A (Further explanation attached _____)

(a) ADEQUATE RECORDS MAINTAINED OF:

(i) SAMPLING DATE, TIME, EXACT LOCATION

☒ YES ☐ NO ☐ N/A

(ii) ANALYSES DATES, TIMES

☒ YES ☐ NO ☐ N/A

(iii) INDIVIDUAL PERFORMING ANALYSIS

☒ YES ☐ NO ☐ N/A

(iv) ANALYTICAL METHODS/TECHNIQUES USED

☒ YES ☐ NO ☐ N/A

(v) ANALYTICAL RESULTS (e.g., consistent with self-monitoring report data)

☒ YES ☐ NO ☐ N/A

(b) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g., continuous monitoring instrumentation, calibration and maintenance records).

☒ YES ☐ NO ☐ N/A

(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT.

☒ YES ☐ NO ☐ N/A

(d) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNIT.

☒ YES ☐ NO ☐ N/A

(e) QUALITY ASSURANCE RECORDS KEPT.

☒ YES ☐ NO ☐ N/A

(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES (and their compliance status) USING PUBLICLY OWNED TREATMENT WORKS.

☐ YES ☐ NO ☒ N/A

SECTION H - Permit Verification

INSPECTION OBSERVATIONS VERIFY THE PERMIT.
DETAILS:☒ YES ☐ NO ☐ N/A (Further explanation attached _____)

(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.

☒ YES ☐ NO ☐ N/A

(b) FACILITY IS AS DESCRIBED IN PERMIT.

☒ YES ☐ NO ☐ N/A

(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.

☒ YES ☐ NO ☐ N/A

(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.

☒ YES ☐ NO ☐ N/A

(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.

☐ YES ☐ NO ☒ N/A(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED. *SEPARATE FLOW METER*☒ YES ☐ NO ☐ N/A

(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.

☒ YES ☐ NO ☐ N/A

(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS.

☒ YES ☐ NO ☐ N/A

(i) ALL DISCHARGES ARE PERMITTED.

☒ YES ☐ NO ☐ N/A

SECTION I - Operation and Maintenance

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.
DETAILS:☒ YES ☐ NO ☐ N/A (Further explanation attached _____)(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED. *NO POWER/NO FLOW*☐ YES ☐ NO ☒ N/A

(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.

☒ YES ☐ NO ☐ N/A

(c) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT.

☐ YES ☐ NO ☒ N/A

(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED.

☒ YES ☐ NO ☐ N/A

(e) ALL TREATMENT UNITS IN SERVICE.

☒ YES ☐ NO ☐ N/A(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS. *CONTRACT*☒ YES ☐ NO ☐ N/A

(g) QUALIFIED OPERATING STAFF PROVIDED.

☒ YES ☐ NO ☐ N/A(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS. *DTT, DRC, DEWA*☒ YES ☐ NO ☐ N/A

(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.

☒ YES ☐ NO ☐ N/A

(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT.

☒ YES ☐ NO ☐ N/A(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED. *LAST UPDATED A WHILE AGO*☒ YES ☐ NO ☐ N/A

(l) SPCC PLAN AVAILABLE.

☒ YES ☐ NO ☐ N/A

(m) REGULATORY AGENCY NOTIFIED OF BY PASSING. (Dates _____)

☐ YES ☐ NO ☒ N/A

(n) ANY BY-PASSING SINCE LAST INSPECTION.

☐ YES ☒ NO ☐ N/A

(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED.

☐ YES ☒ NO ☐ N/A

PERMIT NO.

DE 0000736

SECTION J - Compliance Schedules

PERMITTEE IS MEETING COMPLIANCE SCHEDULE.

☐ YES ☐ NO ☒ N/A (Further explanation attached _____)

CHECK APPROPRIATE PHASE(S):

- ☐ (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.
- ☐ (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING (mortgage commitments, grants, etc.).
- ☐ (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED.
- ☐ (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED.
- ☐ (e) CONSTRUCTION HAS COMMENCED.
- ☐ (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.
- ☐ (g) CONSTRUCTION HAS BEEN COMPLETED.
- ☐ (h) START-UP HAS COMMENCED.
- ☐ (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME.

SECTION K - Self-Monitoring Program

Part 1 - Flow measurement (Further explanation attached _____)

PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT.
DETAILS:☒ YES ☐ NO ☐ N/A

(a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED.

☐ YES ☐ NO ☐ N/ATYPE OF DEVICE: ☒ WEIR ☐ PARSHALL FLUME ☐ MAGMETER ☐ VENTURI METER ☐ OTHER (Specify ULTRA SONS)(b) CALIBRATION FREQUENCY ADEQUATE. (Date of last calibration 2-28-11)☒ YES ☐ NO ☐ N/A

(c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED.

☒ YES ☐ NO ☐ N/A

(d) SECONDARY INSTRUMENTS (totalizers, recorders, etc.) PROPERLY OPERATED AND MAINTAINED.

☒ YES ☐ NO ☐ N/A

(e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES.

☒ YES ☐ NO ☐ N/A

Part 2 - Sampling (Further explanation attached _____)

PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT.

☒ YES ☐ NO ☐ N/A

DETAILS:

(a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.

☒ YES ☐ NO ☐ N/A

(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT.

☒ YES ☐ NO ☐ N/A

(c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT.

☒ YES ☐ NO ☐ N/AIF NO, ☐ GRAB ☐ MANUAL COMPOSITE ☐ AUTOMATIC COMPOSITE FREQUENCY.

(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE.

☒ YES ☐ NO ☐ N/A

(i) SAMPLES REFRIGERATED DURING COMPOSITING

☒ YES ☐ NO ☐ N/A

(ii) PROPER PRESERVATION TECHNIQUES USED

☒ YES ☐ NO ☐ N/A

(iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT

☒ YES ☐ NO ☐ N/A

(iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3

☒ YES ☐ NO ☐ N/A

(e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT.

☐ YES ☒ NO ☐ N/A

(f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT.

☐ YES ☐ NO ☒ N/A

Part 3 - Laboratory (Further explanation attached _____)

PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT.

☒ YES ☐ NO ☐ N/A

DETAILS:

(a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. (40 CFR 136.3)

☒ YES ☐ NO ☐ N/A

(b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED.

☐ YES ☐ NO ☒ N/A

(c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED.

☐ YES ☒ NO ☐ N/A

(d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.

☒ YES ☐ NO ☐ N/A

(e) QUALITY CONTROL PROCEDURES USED.

☒ YES ☐ NO ☐ N/A(f) DUPLICATE SAMPLES ARE ANALYZED. 25 % OF TIME.☒ YES ☐ NO ☐ N/A(g) SPIKED SAMPLES ARE USED. 100 % OF TIME.☒ YES ☐ NO ☐ N/A

(h) COMMERCIAL LABORATORY USED.

☒ YES ☐ NO ☐ N/A

(i) COMMERCIAL LABORATORY STATE CERTIFIED.

☐ YES ☐ NO ☒ N/A

LAB NAME

ENVIRO CORP LAB

LAB ADDRESS

HARRINGTON, DE

PERMIT NO.

DE 000736

SECTION L - Effluent/Receiving Water Observations (Further explanation attached _____)

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
001	NO	NO	NO	NO	NO	CLEAR	—
002	CLOSED						
003	CLOSED						
004	NO DISCHARGE — SEE WRITTEN REPORT						
005-009	CLOSED						

(Sections M and N: Complete as appropriate for sampling inspections)

SECTION M - Sampling Inspection Procedures and Observations (Further explanation attached _____)

- ☒ GRAB SAMPLES OBTAINED
- ☒ COMPOSITE OBTAINED
- ☒ FLOW PROPORTIONED SAMPLE
- ☒ AUTOMATIC SAMPLER USED
- ☒ SAMPLE SPLIT WITH PERMITTEE
- ☒ CHAIN OF CUSTODY EMPLOYED
- ☒ SAMPLE OBTAINED FROM FACILITY SAMPLING DEVICE

SAMPLES TAKEN
ON 8-3-11

1 PER HOUR w/ CONSTANT FLOW

COMPOSITING FREQUENCY

PRESERVATION

SAMPLE REFRIGERATED DURING COMPOSITING: ☒ YES ☐ NO

SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE ☒ YES

SECTION N - Analytical Results (Attach report if necessary)



WATER COMPLIANCE INSPECTION REPORT STORM WATER EVALUATION

National Pollutant Discharge Elimination System Permitting Program
Delaware Department of Natural Resources and Environmental Control
Surface Water Discharges Section

Name and location of Facility Inspected

Pinnacle Foods Group, LLC

MILLSBORO, DE

Entry Date/Time

8-4-11

0945 hrs.

Facility Permit No.

DE 0000736

Facility Contact

BOB LYNCH, RANDY SPENCE

Exit Date/Time

8-4-11 1520 hrs.

An evaluation of the facility's storm water management program was completed in order to determine whether or not the facility is operating in compliance with regards to the storm water permitting requirements of their NPDES permit. The evaluation consisted of a records review and a visual observation of the facility's storm water management system.

The facility is permitted to discharge storm water from Outfall(s)

RECORDS REVIEW

	Yes	No	S/C
1) Storm Water Plan. Has the facility developed and implemented a Storm Water Plan as required by Part III of their NPDES Permit? What is the date of the current SWP?	✓		✓
2) Training. Training completed annually? Are all employees and contractor personnel that work in areas where industrial materials are used/stored trained to meet the requirements of the SWP?		✓	✓
3) Inspection Records. Are storm water inspections conducted and documented? Please describe.	✓		
4) Monitoring Data. Has the facility performed storm water monitoring as required by the permit?	✓		
5) Spill and Leaks. Have any major spills or leaks occurred resulting in a discharge to the storm water conveyance system? If so, are records maintained indicating spills/leaks?		✓	N/A

PHYSICAL INSPECTION

	Yes	No	S/C
1) Storm Water Outfalls. Are storm water outfalls identified as required?	✓		
Outfalls free of trash/ debris/erosion?	✓		
Any non-storm water discharges occurring?		✓	
2) Storm Water Conveyance System. Are catch basins, storm water conveyance systems and storm water treatment facilities cleaned at appropriate intervals? Is the storm water conveyance system free of trash and debris?		✓	✓
			CATCH BASIN TO 004
3) Good Housekeeping Practices. Are outside areas kept neat and clean? Is process debris removed regularly?	✓		
Is there evidence of leaks/spills?		✓	
Is there evidence of particulate matter or visible deposits and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water discharge?		✓	
4) Storm Water Pollution: materials being stored in a manner that minimizes their exposure to storm water?	✓		
5) Storm Water Visual Observations: Are the following present in storm water discharges or do the outfalls indicate evidence thereof?			

OUTFALL NUMBER	OIL SHEEN	VISIBLE FOAM	VISIBLE FLOATING SOLIDS	COLOR
001, 003, 005-009	DRY & CLEAN			
004 "SUMP"	YES	NO	YES	VERY DARK
	NO DISCHARGE AT TIME OF INSPECTION			

COMMENTS

SW PLAN MUST BE REVIEWED & UPDATED - TRAINING MUST BE COMPLETED - CATCH BASIN TO 004 NEEDS CLEANING & 004 "SUMP" MUST BE CLEANED.

Compliance Status At Time of Inspection:

NON-COMPLIANT

Reconnaissance Inspection Required: Yes or No

If Yes, an Inspection shall be completed within 3 months.

Inspector's Printed Name:

GLENN DAVIS

Inspector's Signature:

Date:

8-4-11

SYNAGRO CENTRAL, LLC
7014 EAST BALTIMORE STREET
BALTIMORE, MD 21224

PROJECT: 1103 - PINNACLE FOODS / MILLSBORO, DE
4/1/2011 thru 4/30/2011

PLANT: 01 - VLASIC FACILITY

Field: DE-SX-00003-0-0007-J

<u>Date Loaded</u>	<u>Total</u>	<u>Unit</u>	<u>Type</u>
4/15/2011	105,000.00	G	LIQ
LIQ Gallons:	105,000.00		
Field Total (Gallons):	105,000.00		

Field: DE-SX-00003-0-0007-K

<u>Date Loaded</u>	<u>Total</u>	<u>Unit</u>	<u>Type</u>
4/14/2011	42,000.00	G	LIQ
LIQ Gallons:	42,000.00		
Field Total (Gallons):	42,000.00		

Field: DE-SX-00003-0-0007-L

<u>Date Loaded</u>	<u>Total</u>	<u>Unit</u>	<u>Type</u>
4/11/2011	140,000.00	G	LIQ
4/12/2011	196,000.00	G	LIQ
4/13/2011	245,000.00	G	LIQ
4/14/2011	273,000.00	G	LIQ
LIQ Gallons:	854,000.00		
Field Total (Gallons):	854,000.00		
Plant Total Gallons:	1,001,000.00		



HORNEY INDUSTRIAL ELECTRONICS

Process Control Technology

CERTIFICATE OF CALIBRATION

Date : February 28, 2011

Pinnacle Foods
29984 Pinnacle Way
Millsboro DE 19966

Purchase Order: 0710028896

Job#:605573

<u>Manfg.</u>	<u>Serial#</u>	<u>Range</u>
EB Flow: E/H FMU 861	8AR009-EP40	0-1000 GPM
Raw Flow: F/P 1392 C/R	9508-51045-C03	0-1200 GPM
F/P Ultrasonic	95W032110	0-1200 GPM
UV Effluent Flow: F/P 1392 C/R	9411-40025-B03	0-500 GPM
F/P Ultrasonic	95W001009	0-500 GPM
Spray Irrigation: H/W DR4500AT C/R	0911Y980723300002	0-400 GPM
Siemens Mag 5000	104213N056	0-400 GPM
Siemens Mag 5100 3" Tube	469113T036	0-400 GPM
WTB: Siemens Mag 5000	840849N164	0-2000 GPM
Siemens Mag 5100	289009T254	0-2000 GPM



HORNEY INDUSTRIAL ELECTRONICS

Process Control Technology

Tank Alarm:

Kep INT69 #4
IFM

47925
4430B

32-480" H2O
0-400" H2O

Kep Int69 #5
IFM

51824
4611B

55-455" H2O
0-400" H2O

ALL CALIBRATION TRACEABLE TO N.I.S.T. AS PER MANFG. SPECIFICATION

A handwritten signature in black ink, appearing to read 'Randy', is written over a horizontal line.

CALIBRATION WORKSHEET

IN: 000848

P.O. Box 700 Bridgeville, DE 19933
Phone (302) 337-3600 Fax (302) 337-8560

Customer Name	Pinnacle Foods	Customer PO No.	0710023896
Address	29984 Pinnacle Way	Account No.	
City, State, Zip	Millsboro, DE. 19966	Date	2/28/11
Job Description	Calibration	Terms	Net 20

BBINT Manufacturer		Serial Number	Range	Departure
SIEMENS	5000	840849 N164	2000.06PM	X
SIEMENS	5100 CR=109	289009 T254	2000.06PM	O
SPRAY IRR				
SIEMENS	5000	104213 N056	0-400GPM	O
SIEMENS	5100 CR=122.2	469113 T036	0-400GPM	O
RWD	F/P 1392 Z = 40.76	9508-51045-C03	0-1200GPM	O
EFP	F/P 1392 Z = 29.50	9411-40025-B03	0-500GPM	X
1/4 FWD 8161		8AR00A EP40	0-1000GPM	X
TANK ARM				
KCP INT 69	H4	47925	32 - 480" H ₂ O	
I FM		44300	0 - 400" H ₂ O	
INT 49	H5	51824	55 - 455" H ₂ O	
I FM		4611B	0 - 400" H ₂ O	

Comments	Hours
5 PK black chart pens	3.0 HR
# 82-39-0101-06	

Service Engineer

er Bob Lynch

Customer Signature

Date _____

Above work was completed to our satisfaction



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES AND
ENVIRONMENTAL CONTROL
DIVISION OF WATER
89 KINGS HIGHWAY
DOVER, DELAWARE 19901

ENVIRONMENTAL
LABORATORY SECTION

PHONE: (302) 739-9942
FAX: (302) 739-3491

August 16, 2011

J. Chris Cleaver
DWR - Surface Water Discharge Section - NPDES
89 Kings Highway
Dover, DE 19901

Attention: J. Chris Cleaver

Attached you will find the following Laboratory Results:

Order Number: 1108017
Project Description: Pinnacle
Date Received: 08/03/2011
Time Received: 13:50

If you have any questions regarding this data, please contact me at the above telephone number.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathy A. Knowles".

Kathy A. Knowles
Laboratory Manager

Delaware's good nature depends on you!



Environmental Laboratory Section - Division of Water
Delaware Department of Natural Resources and Environmental Control
89 Kings Highway, Dover, DE 19901 Phone: 302-739-9942

Order #1108017
08/16/2011
Page 2 of 5

ANALYSIS REPORT

ELS Sample Number:	1108017-001	Matrix:	Waste Water			
Client Sample Description:	001	Sampling Method:	Composite			
Site ID:		Date and Time Collected:	8/3/2011			
Test Parameter	Method	Result	Units	Qualifier	LOQ	Analysis Date
Inorganic Nonmetallic Constituents						
Ammonia as N, Total	USEPA 350.1	0.023	mg/L		0.020	08/05/2011
Phosphorus, Total, Alkaline Persulfate	APHA 4500-P-J	0.369	mg/L		0.010	08/04/2011
Organic Aggregate Constituents						
BOD, 5-Day	APHA 5210-B	< 2.40	mg/L		2.40	08/04/2011
Physical and Aggregate Properties						
Residue, Nonfilterable (TSS)	APHA 2540-D	4	mg/L		2	08/04/2011

ANALYSIS REPORT

ELS Sample Number:	1108017-002	Matrix:	Waste Water			
Client Sample Description:	001	Sampling Method:	Grab			
Site ID:		Date and Time Collected:	8/3/2011	10:40		
Test Parameter	Method	Result	Units	Qualifier	LOQ	Analysis Date
Microbiological Examination						
Enterococcus	USEPA 1600	< 1	cfu/100ml		1	08/04/2011

ANALYSIS REPORT

ELS Sample Number:	1108017-003	Matrix:	Waste Water			
Client Sample Description:	001-1	Sampling Method:	Grab			
Site ID:		Date and Time Collected:	8/3/2011	10:41		
Test Parameter	Method	Result	Units	Qualifier	LOQ	Analysis Date
Microbiological Examination						
Enterococcus	USEPA 1600	< 1	cfu/100ml		1	08/04/2011



Qualifier Codes, Definitions, and Abbreviations

Qualifier/Flag

<	Sample value is below the method detection limit. The result is reported as < MDL.
>	Sample value is above the upper quantitation limit. The upper quantitation limit is reported.
AB	Air Bubble in DO bottle
B	The parameter was detected in the method blank at a concentration that was both above the MDL and greater than 10% of the sample concentration.
BT	Secchi disk ON BOTTOM. The reported result is the depth from the surface to the bottom.
C	See report narrative or comment line for observations concerning this result.
D	Sample diluted for analysis.
EG	Value exceeds a theoretically equivalent or greater value (e.g., dissolved > total).
EW	Value exceeds a theoretically equal or greater value (e.g., dissolved > total). However, the difference is within the expected precision of the analytical techniques and is not statistically significant.
FB	The parameter was detected in the field blank at a concentration that was both above the MDL and greater than 10% of the sample concentration.
FZ	Samples frozen prior to analysis
I	The reported value is estimated due to the presence of interference.
IM	Instrument malfunctioned; No measurement taken.
J	Analyte present; reported value is estimated; concentration is below the range for accurate quantitation (greater than the MDL, but less than the LOQ).
JH	Result is likely overestimated due to matrix effect.
JL	Result is likely underestimated due to matrix effect.
LOQ	Limit of Quantitation
MDL	Method Detection Limit
N	This flag indicates presumptive evidence of a compound. This flag is only used for TICs, where the identification is based on a mass spectral library search and must be used in combination with the J flag. It is applied to all TIC results. For generic characterization of a TIC, such as chlorinated hydrocarbon, or for an "unknown" (no matches >= 85%), the "N" flag is not used.
NA	Not Analyzed but required by project workplan or analytical request form.
NBF	No bottom measurement recorded in the field due to shallow water; Bottom records are those measurements recorded at surface.
NC	Sample not collected, but required by the project work plan.
ND	Not Detected.
NE	Field measurement not taken due to uncontrollable field sampling event or Natural Condition (Depth of water too deep/shallow).
NF	Sample collected, but not analyzed by the laboratory due to field error.
NO	None Observed
NR	No Result. See report narrative or comments for explanation.
NV#	Analytical result not valid.
O	Sample outsourced for analysis. Data will be reported separately.
P	Sample not properly preserved in field in accordance with preservation requirements. Data may be suspect.
QC	Quality control value is outside acceptance limits.
QNS	Quantity not sufficient. Not enough sample to perform requested analyses.
S	Results will be reported in a separate report; See attached report.
SD	Sample discarded; Sample collected but not analyzed as per client request.
SNF	Site has no flow (i.e. a dry stream or a stream with no velocity)
STD	Stream too deep
STS	Site is too shallow to sample
TIC	Tentatively identified compound from a GC/MS library search.
U	Compound was analyzed but not detected. The method detection limit is reported.
USGS	USGS Gauge
V	Analysis performed after holding time expired.



Qualifier Codes, Definitions, and Abbreviations

Units

CFS	Cubic Feet per Second.
cfu/100mL	Colony forming units per 100 mL.
G	gram; there are 1000 g in 1 Kg.
GPM	Gallons per minute.
IN	Inches.
Kg	Kilogram.
L	Liter.
mg	milligram; there are 1000 mg in 1 g.
MGD	Millions of Gallons per Day.
ml	milliliter; there are 1000 ml in 1 L.
mpn/100mL	most probable number per 100 mL.
NTU	Nephelometric Turbidity Units. NTU is numerically equivalent to Formazin turbidity unit (FTU).
oC	Celsius.
pCi/L	Pico curie per liter.
ppb	Parts per billion=ug/Kg, ug/L.
ppm	Parts per million=mg/Kg, ug/g, mg/L, ug/ml; 1 ppm=1000 ppb.
su	Standard Units.
ug	microgram; there are 1000 ug in 1 mg.
uL	microliter; there are 1000 ul in 1 mL.
uMhos	Conductivity units for laboratory measurements.
uS	micro siemens; units used to measure conductivity in the field; same as uMhos.

FIELD CHAIN OF CUSTODY

Environmental Laboratory Section - Division of Water Research
Department of Natural Resources and Environmental Control
89 King Highway Dorset, DC 19907 062, 715-8942



Client : J. Chris Cleaver
Address : 89 Kings Highway
Dover, DE 19901
Phone No.: (302) 734-9946

Report To : A. Chris Cleaver
 Invoice To : A. Chris Cleaver
 Account : NPDES
 ELS Order #: 1108017

[illegible]

PLS USE ONLY

Sample Conditions (circle response):

1. Samples match COC? ☒ Yes/☐ No 2. Bottles supplied by ELIS? ☒ Yes/☐ No 3. Samples received broken/leaking? ☒ Yes/☐ No 4. Cooler temp bottle 2-6 degrees? ☒ Yes/☐ No 5. Properly preserved? ☒ Yes/☐ No 6. VOA/DO containers free of headspace? ☒ Yes/☐ No 7. Holding times expired? ☒ Yes/☐ No 8. Volume sufficient for analysis? ☒ Yes/☐ No

8-4-11 Pinnacle Falls (CSI)

- Arrived @ approx 0945 hrs and met w/ Bob Lynch.
- Influent thru (2) static screens; screenings to tank fill
- Flow monitored to EQ tanks / Srt tanks, then pumped to circular EQ tank (425,000 gallons) *
- WAS to two (2) aerobic digesters (250,000 gallons each).
- Sludge from digesters goes to 2 million gallon sludge lagoon (lined).
- Two times per year the sludge lagoon is pumped off by Synagro and land applied @ Batten Farm in Georgetown.
- * From EQ Tank to Aeration Tank (1 mm gallon capacity)
- Then to (1) circular clarifier (120,000 gal)
- Flow from clarifier gravity fed to (2) Parkerson Sand Filter and then through UV (TREATM) disinfection
- Storm Water Outfall 002 was dry and no debris.

8-4-11 PINNACLE (C&I) (cont'd)

- Outfall 003 (storm water) was dry - no debris.

(90)

(A)

- Outfall 004 has a sump area prior to discharging. This area has a lot of stagnant water that had a sheen. This storm water is all from the main parking lots and truck traffic area.

- Outfall 005 - dry & clean

- Outfall 006, 007, 008, 009 all were dry & clean.

- 001 Outfall clean, no debris, no sludge, no floating solids. 001 discharges to Wharton's Branch → Iron Branch → Indian River.

- Renewed DMR from May, 2011
All looks great!

(A)

Renewed Storm Water Plan

Last update December, 2007 - needs to be updated every three (3) years.

No documented evidence of Storm Water PP training - must have this.

Monthly & Annual inspections are complete & documented.

PD

4/2/11

8-4-11 Run ACUE (CSF) (cont'd)

★ SMC Plan Reviewed; last update was July 2007

★ No documented evidence of SMC training

— Sludge inventory is maintained

— Held closing meeting with Plant Manager Randy Spence & WWTP Super Bob Lynch

— Departed facility @ approx. 1520 hrs.

A handwritten signature, possibly reading "JL", is written in the center of the page. A long diagonal line is drawn across the lower half of the page, starting from the left margin and extending towards the bottom right corner.



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES &
ENVIRONMENTAL CONTROL
DIVISION OF WATER RESOURCES
89 KINGS HIGHWAY
DOVER, DELAWARE 19901

Surface Water Discharges Section

Telephone: (302) 739-9946
Facsimile: (302) 739-8369

Certified Mail: 7006 3450 0003 3848 4188
Return Receipt Requested

August 11, 2011

Pinnacle Foods Corporation
Mr. Randy Spence – Plant Manager
29984 Pinnacle Way, Rt. 331
P.O. Box 625
Millsboro, DE 19966

Re: Compliance Sampling & Inspection (CSI) – August 4, 2011
NPDES Permit No. DE-0000736
Follow-up Letter and **Manager's Deficiency Warning**

Dear Mr. Spence:

On behalf of the State of Delaware, Surface Water Discharges Section, Compliance & Enforcement Branch, I would first like to thank you, Mr. Bob Lynch, Mr. Dennis Parkinson, and your associates, for the cooperation and assistance during the Compliance Sampling & Inspection (CSI) completed at your facility on August 4, 2011.

I would like to compliment Mr. Bob Lynch for his very thorough and informative tour of the wastewater treatment plant and the facility perimeter/storm water outfalls tour. Mr. Lynch is very knowledgeable and was able to answer all questions that came up during the inspection. Overall housekeeping at the WWTP and the outside areas of the facility was very good and your associates are to be complimented. Laboratory records, reagents, instrumentation, methods, and holding times were found to be within NPDES requirements. A review of the facility's May, 2011 Discharge Monitoring Report, revealed that all entries were accurate and traceable back to the analytical raw data. During this CSI, I also had the opportunity to complete a thorough Storm Water Pollution Protection inspection, and a review of your SPCC Plan. Although there was documented evidence that all inspections had been completed there were deficiencies as noted below.

Delaware's good nature depends on you!

The following deficiencies were noted during this inspection:

- Storm Water Outfall 004 has a “sump area” that must overflow before any storm water can be discharged. This “sump area” has a lot of stagnant storm water that appeared to have an “oily sheen” and the water was very discolored. It also appeared that the side walls had some type of black oily residue built up at the water line. Although none of this material was discharging at the time of this inspection, it was apparent that on the next rain event, this oily residue would be discharged. The facility must maintain this storm water sump in a manner so as to prevent contamination at the discharge. The facility must take steps to stop any oil contamination from getting to the Outfall 004 sump area, by being proactive at the main parking lot storm drain area.
- A review of the facility’s Storm Water Plan revealed that the last plan update was completed in December, 2007; your Storm Water plan specifies that the plan must be updated every three years. There was also no documented evidence that the required Storm Water Plan training had been completed.
- A review of the facility’s SPCC Plan revealed no documented evidence that the required annual training had been completed. SPCC regulations require a minimum annual refresher training for all employees and contractors who may handle any oil type materials in the course of their work day.

Required corrective action for the above mentioned deficiencies:

- Storm Water Outfall 004 “sump” must be cleaned out within two weeks of receipt of this Manager’s Deficiency Warning Letter. These cleanout activities shall be documented in writing and with photographs showing the cleaned sump area at 004 and any activities/changes at the parking lot catch basin area.
- Within 90 days of receipt of this Manager’s Deficiency Warning Letter, the Storm Water Plan shall be reviewed and updated. The review log shall be updated, and the revised Storm Water Plan shall be forwarded to the DNREC - Surface Water Discharge Section.
- Within 60 days of receipt of this Manager’s Deficiency Warning Letter, all employees and contractors, as outlined in your Storm Water Pollution Protection Plan, shall receive proper training on the facility’s Storm Water Plan. This training shall be documented and copies of the employee training sign-in shall be forwarded to my attention.
- Within 60 days of receipt of this Manager’s Deficiency Warning Letter, all employees and contractors, as outlined in your SPCC Plan, shall receive proper training on the facility’s SPCC Plan. This training shall be documented and copies of the employee training sign-in shall be forwarded to my attention.

The Surface Water Discharges Section is attempting to gain voluntary compliance in accordance with 7 Del.C. § 6019. Failure to comply with the required corrective action iterated in this inspection follow-up correspondence may result in formal enforcement action in accordance with 7 Del. C. § 6005. Please send your formal written response, including any corrective/preventative actions to the above noted deficiencies, by no later than 30 days after receiving this letter. The formal written

Pinnacle Foods Group, LLC
CSI – August 4, 2011
Page Three

response must be mailed to my attention at Delaware-DNREC, Division of Water, Surface Water Discharges Section, Compliance & Enforcement Branch, 89 Kings Highway, Dover, DE 19901.

I would again like to thank you, Mr. Bob Lynch, Mr. Dennis Parkinson, and your associates, for the cooperation and participation in this Compliance Sampling Inspection program to help assure the continued quality of NPDES effluent waters and the self-reporting data. If you have any questions, please contact me at 302-739-9946.

Sincerely,

A handwritten signature in black ink, appearing to read 'Glenn F. Davis', is written over the word 'Sincerely,'.

Glenn F. Davis
Program Manager
Surface Water Discharges Section
Compliance & Enforcement Branch
State of Delaware – DNREC

ecopy: Mr. Rob Underwood - DNREC